

Julia Richards,
Riverside House,
2A Southwark Bridge Road,
London SE1 9HA.
(email foodadvertising@ofcom.org.uk)

Television Advertising of Food and Drink Products to Children – Ofcom Consultation

PTF's members are companies of all sizes involved in supplying bacon and ham; chilled and processed meats; dairy products of all kinds, including milk powders, cheese, butter, yogurt and other dairy desserts; and canned foods. Our members include importers and exporters of these products, as well as processors. A number of our members, particularly those involved in the supply of cheese and dairy desserts, advertise their products to children and therefore have an interest in this consultation. We would urge Ofcom to limit the extent of the restriction on advertising to children to those below the age of 9, as

proposed in the original consultation, for the reasons outlined below. The alternative would mean a severe, and we believe unjustified, restriction on the advertising options for products, such as cheese, which are not perceived as junk foods by the majority of the viewing public. Ideally we would prefer that the restrictions were not based on the use of the FSA nutrient profiling model or exceptions should be made for products, such as cheese, which offer important nutritional benefits to children, such as cheese.

We are particularly concerned that Ofcom proposes to introduce what amounts to a ban on advertising many meat and dairy products before 9pm, while at the same time acknowledging that “television advertising has only a modest direct effect on childhood dietary habits. Other factors in the family home, playground, school dining room and playing fields have a greater role in driving up levels of childhood obesity when compared to the role played by commercial advertising airtime.” Moreover, there is no evidence to show that natural, lightly processed foods are responsible for childhood obesity.

We urge you to reconsider the decision to base your proposed TV advertising restrictions on the FSA nutrient profiling model. We are aware that this latest consultation does not extend to the use of this model. However, we feel sufficiently strongly that we must reiterate our views. Many of the products that fall within PTF's remit will score above 4 using the FSA nutrient profiling model and therefore will be classified as “less healthy” and will be subject to the restrictions on TV advertising proposed by Ofcom. We object strongly to this as we believe that these products, such as cheese and ham, are not junk foods, and should not be treated as “unhealthy”. Instead they are important contributors of nutrients to children's diets particularly when consumed with fruit, vegetables and starchy foods, as is usually the case.

Other products which are traditionally perceived as “healthy foods”, notably ham, are also classified as “less healthy” according to the model. Classifying nutrient dense

protein foods as “less healthy” sends out a message to our children which is completely at odds with the generally accepted view of the importance of a balanced diet, which should include these foods.

Another major flaw of the model is that scoring is based on 100g of a product, regardless of normal portion size. Foodstuffs which are consumed in amounts considerably less than 100g (such as cheese for which the portion size is about 30g) are therefore at a disadvantage.

Our members have commented that advertising can be used not just to sell products, but also to inform and educate consumers. The Ofcom proposals will, among other things, deny companies the option of educating children about the importance of meat and dairy products in their diets. This is of particular importance as many young girls are known to be lacking in calcium and iron.

We note that the FSA model states that if a food or drink scores 11 or more A points, it cannot score points for protein unless it also scores 5 points for fruit, veg and nuts, (i.e. they must be incorporated in the food). Cheese is often eaten with fruit and nuts, therefore it should benefit from the option to score protein points if this combination is reflected in the advert.

As many of our members’ products would be affected by the new rules, and we believe unjustifiably so, we do not support an extension of the restriction on HFSS advertising from programmes of particular appeal to children aged up to 9 to those aged up to 15. This change embraces a much wider range of programmes and therefore severely restricts our members’ ability to advertise their products to adults, as well as children.

Yours sincerely,

Diana Axby

Provision Trade Federation